

In regards to request exemption from drug and alcohol testing requirements to include NON-CDL individuals, I am against granting the exemption. My concerns are; (1) the rule was put into place with respect to safer operation of commercial motor vehicles, a regulated industry. I am all for employee D/A testing in the NON-regulated work force, as long as all policies and procedures are separate from the FMCSA. (2) by allowing NON-CDL individuals to be placed into the random D/A testing pool the chances that a legitimate CDL holder would be selected is diminished, due the increase in numbers' of individuals now in the program. This would defeat the purpose of D/A testing of a regulated group of individuals. Granted, it would be much easier for the company to include all individuals under one program, less work for the company administratively, but not at all appropriate. The benefit to having a separate D/A policy for, NON-regulated individuals, is obvious, you set the guidelines where, you the employer, want them. Thank You. Lawrence C. Hartung CDS CDT